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BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.

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In the Matter of)

Advanced Television Systems)
and Their Impact upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

FEDERAL BROADCASTING COMMISSION
OFFICE OF SECRETARY

**COMMENTS OF
ALASKA BROADCASTERS ASSOCIATION**

Alaska Broadcasters Association ("ABA"), by its attorneys, hereby submits its comments in the Federal Communications Commission's ("FCC") Sixth Further Notice of Proposed Rulemaking ("NPRM") issued in the above-referenced proceeding.^{1/} ABA strongly supports the adoption by the Commission of the Grand Alliance Standard as described in the Final Technical Report of the Advisory Committee on Advanced Television Services. Additionally, because of the unique situation facing the broadcasters in Alaska, ABA proposes a modification to the draft Table of Allocations set forth by the Commission in its NPRM, and recommends that the Commission adopt more flexible guidelines in the transition from NTSC to DTV.

BACKGROUND

The ABA was founded in 1964 to help broadcasters better serve the public interest and address matters of common concern to the Alaska radio and television industry. Most Alaska stations, both commercial and non-commercial that have met the eligibility requirement of

^{1/} Notice of Proposed Rulemaking, MM Docket No. 87-268, FCC 96-317 (August 14, 1996).

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receiving an FCC grant of a construction permit, are ABA members. ABA works with manufacturers, broadcast consultants and service firms to remain an essential link between communities, local businesses and broadcasters. Further, the ABA functions as a conduit through which broadcasters can voice their concerns and suggestions to the FCC.

DISCUSSION

I. THE ALASKA BROADCASTERS ASSOCIATION PROPOSES A MODIFIED DTV TABLE OF ALLOCATIONS THAT WOULD BETTER SERVE THE PUBLIC INTEREST

In this NPRM, the Commission is continuing its development of policies, procedures and technical criteria to be used in the allotment and assignment of channels for digital TV service. The Commission has set forth a table of channel allotments for DTV service which it has "based on the principles of full accommodation for all eligible existing broadcasters, replication of existing broadcast service areas, and sound spectrum management." NPRM at para. 7. In addition, the Commission has noted that the best method for allotting and assigning the DTV channels is through voluntary negotiations among the affected broadcasters. Id. at para. 47. Nowhere is this more relevant than in the Alaska broadcasting environment.

Because Alaska has a vast amount of land area in comparison to areas of small population, there are great distances between Alaskan communities served by broadcast stations. Three primary communities are served by television service in Alaska - Anchorage, Fairbanks and North Pole. North Pole in turn is only served by one station. Therefore, there is sufficient spectrum available to Alaskan broadcasters without concern of causing interference to other broadcast stations in Alaska or in affected areas of Canada.

Pursuant to the Commission's suggestion, the Alaskan broadcasters that currently operate full service television stations have negotiated among themselves to create allotment and

assignment pairings that they believe will allow the broadcasters to provide future DTV service that is equal to if not superior in coverage to the current NTSC service. The television broadcasters in Anchorage, Fairbanks and the North Pole propose a cooperative co-location of their DTV transmitters and antennas that is attached hereto as Exhibit A.^{2/} The ABA believes that co-location will provide broadcasters with numerous benefits. Joint towers and perhaps common antennae can be used by broadcasters, thus minimizing costs so as to allow the redeployment of resources into developing digital programming services. The common sites would also help viewers receive programming from all of their local broadcast services from a single location -- minimizing interference concerns and optimizing the benefits to be achieved from common orientation of home users' reception antennae. Additionally, the common tower and antenna will reduce FAA and environmental concerns. Thus, this proposal will serve the public interest.^{3/}

II. THE ABA URGES THE COMMISSION TO ADOPT FLEXIBLE MINIMUM POWER LEVELS FOR DTV OPERATIONS

The Commission set forth maximum and minimum limits for effective radiated power (ERP) and antenna height above average terrain (HAAT) for UHF and VHF DTV operation. The Commission proposes these ERP and HAAT levels as a method of ensuring full replication of the NTSC signal, and also allowing for an expansion the signal coverage area, as the stations

^{2/} Under the Commission's policy, if broadcasters enter into voluntary negotiations and create a revised allotment plan, the Commission proposes to require that all requests be signed by the licensees of all involved stations. NPRM at para. 47. The ABA is currently gathering signatures from all the interested broadcast licensees in Anchorage, Fairbanks and North Pole, and will submit a list to the Commission when it is complete.

^{3/} In addition, the ABA has identified certain technical errors used in the FCC database for the Fairbanks, Alaska region. The individual stations that are affected by this error will file the appropriate corrections with the Commission when necessary.

make the transition to DTV. NPRM at paras. 94-96. The ABA believes that because of the small population of Alaska concentrated in its metropolitan areas, and vast areas with little or no human habitation, it would better serve the public interest to initially allow UHF stations to operate the DTV stations at a lower ERP level than the Commission is currently requiring. In this way, a station could implement DTV service at lower power levels and not face the millions of dollars in expense predicted for some high power UHF transmitters, an expense which in Alaska may end up serving areas with little or no population. As costs for equipment decrease over time and the population in Alaska grows, stations could then expand their coverage as necessary to cover outlying areas. Thus, The ABA urges the Commission to adopt minimum power levels that are more consistent with those required for NTSC broadcast television service.

In the initial transition stages of DTV service, the ABA feels it is more important to provide an adequate DTV signal to the community of license, rather than having signal coverage area be the primary determinant of the DTV station's operating level. If DTV stations are forced to comply with the ERP and HAAT requirements proposed by the Commission, the economics of providing service to the small markets will become problematic. ABA proposes a more flexible approach to operating power levels. This choice would help facilitate earlier and more numerous DTV operations to the Alaskan communities, thus better serving the public interest.

III. THE COMMISSION SHOULD GRANT THE BROADCASTER DISCRETION IN CHOOSING THE CHANNEL FOR DTV OPERATIONS

The Commission in its DTV implementation plan proposed to provide broadcasters with the temporary use of a second channel for DTV operations. At the end of the transition period, however, the Commission would reclaim one of the two channels. NPRM at para. 15. Further, the DTV allotments have been proposed to be located in the UHF band. The ABA believes that

a television broadcaster should be allowed to choose whether to retain the UHF DTV channel for its operations or to move these operations to the station's former NTSC channel, whether that was VHF or UHF. Alaska is primarily rural, and therefore any noise reception factors that might otherwise occur on VHF channels are mitigated. In addition, Alaska broadcast stations will not experience significant co-channel interference because of Alaska's remote geographical location.

The rugged mountainous terrain of the state may also prove to cause less of a barrier to coverage on the VHF channel than on a UHF channel. Therefore, it would better serve the public if the broadcaster had the option to retain its former NTSC channel following transition, and the broadcaster then could choose whether to return that channel or the UHF DTV channel to the Commission.

IV. THE END OF THE TRANSITION PERIOD SHOULD BE BASED ON MARKET DETERMINATION, AND NOT A NATIONAL, ARBITRARY STANDARD

The Commission has proposed a period of fifteen years by which the transition from NTSC operations to DTV operations must be made. NPRM at para. 7. ABA urges the Commission to adopt a timetable that is no less than 15 years, as the transition will be a complex and time-consuming process. Further, the Commission would be better served if it makes individual market determinations to develop the end of the transition period, instead of relying upon a nationally determined and arbitrary date. While this places a heavier burden on the Commission, ABA believes it would better serve the public interest as different geographic regions, like Alaska, may face different implementation issues that may necessitate a different transition period than other regions.

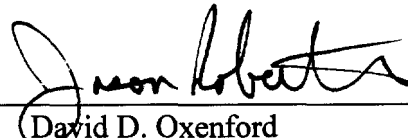
CONCLUSION

ABA enthusiastically supports the Commission's efforts in setting forth proposed policies, procedures and technical criteria for the transition from NTSC broadcast service to DTV service. ABA is submitting as part of its comments a proposed modification to the FCC Table of Allocations, which was negotiated in a voluntary fashion by the currently operating full service stations in Alaska. Further, the ABA urges the Commission to enact guidelines that allow the broadcasters flexibility to implement the transition in a matter that best serves its coverage area and the public interest.

Respectfully submitted,

ALASKA BROADCASTERS ASSOCIATION

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Dated: November 22, 1996

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EXHIBIT A
COMMENTS OF ALASKA BROADCASTERS ASSOCIATION
MM DOCKET NO. 87-268

PROPOSED MODIFICATION TO DTV TABLE OF ALLOCATIONS

Anchorage

<u>NTSC</u>	<u>FCC DTV</u>	<u>ABA DTV</u>
2	51	18
4	23	20
5	21	22
7	16	24
9 ^{1/}	15	26
11	14	28
13	17	30
33	32	32

Fairbanks

<u>NTSC</u>	<u>FCC DTV</u>	<u>ABA DTV</u>
2	44	18
7	--	22
9	5	24
11	13	26
13	--	28

North Pole

<u>NTSC</u>	<u>FCC DTV</u>	<u>ABA DTV</u>
4	28	20

^{1/} The Commission has not yet determined the permittee for this allotment.